

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOHN COLLIER, KRYSTA RENFRO, ALEX SAMUELS, BRADLEY CARICOFE, SHAWN THIBODEAUX, JULIE THIBODEAUX, CATHY CARROLL, LAZARO GOMEZ, KENNETH HUNNEL, LEANNE HUNNEL, and JAMES KOHEN individually, and on behalf of a class of similarly situated individuals,

Plaintiffs,

V.

FORD MOTOR COMPANY, a Delaware corporation,

Ford.

STIPULATION

Plaintiffs and Defendant Ford Motor Company, by and through their undersigned counsel, respectfully stipulate as follows:

1. Plaintiffs filed their initial Complaint in this case on August 28, 2023.
2. Defendant waived service of the Summons and Complaint pursuant to Federal Rule of Civil Procedure 4, which extended Defendant's deadline to respond to the Complaint to November 5, 2023.

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3. Plaintiffs propose to file a First Amended Complaint on or before October 20, 2023.
4. Pursuant to Fed. R. Civ. P. 15(a)(2), Defendant hereby consents to Plaintiffs filing a First Amended Complaint on or before October 20, 2023.
5. The Parties have stipulated to allow Defendant 49 days from the date of filing and service of the First Amended Complaint to file a responsive pleading or motion pursuant to Federal Rule of Civil Procedure 12.
6. Should Defendant respond to the First Amended Complaint with a motion pursuant to Rule 12, the parties have agreed to a briefing schedule that will accommodate the Parties' respective schedules.

NOW THEREFORE, the parties jointly stipulate and respectfully ask the Court to

(1) grant leave to Plaintiffs to file a First Amended Complaint, (2) extend the deadline for Defendant to file a responsive pleading or motion pursuant to Federal Rule of Civil Procedure 12 and set a briefing schedule as follows:

Plaintiffs' deadline to file first amended pleading: October 20, 2023

Deadline to file responsive pleading or Rule 12 motion: December 8, 2023

Plaintiffs' response to Rule 12 motion, if filed: January 18, 2024

Defendant's reply in support of Rule 12 motion, if filed: February 7, 2024

Noting date for Defendant's Rule 12 motion, if filed: February 7, 2024

DATED this 17th day of October, 2023.

Respectfully submitted,

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ORDER

Pursuant to the parties' stipulation, Plaintiffs are granted leave to file a First Amended Complaint. The Court adopts the parties' agreed briefing schedule, as set forth below:

Plaintiffs' deadline to file first amended pleading: October 20, 2023

Deadline to file responsive pleading or Rule 12 motion: December 8, 2023

Plaintiffs' response to Rule 12 motion, if filed: January 12, 2024

Defendant's reply in support of Rule 12 motion, if filed: January 26, 2024

Noting date for Defendant's Rule 12 motion, if filed: January 26, 2024

IT IS SO ORDERED.

Dated this 19th day of October, 2023.

The Honorable Benjamin H. Settle

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